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-and-

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UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA and
NEW YORK STATE *ex rel.* ORLANDO LEE,
MELVILLE LUCKIE and LUZ GONZALEZ,

Plaintiffs/Relators,

- against -

Civ. No. CV 13-4933 (MKB)

NORTHERN ADULT DAILY HEALTH CARE
CENTER and GALENA DEVERMAN,

Defendants.

DECLARATION OF ROBERT W. SADOWSKI

I, Robert W. Sadowski, attorney for Relator Orlando Lee, submit this declaration in support of Relators' Motion for Alternate Remedy, and allege as follows:

1. Attached hereto please find Exhibit A, Relators' Complaint, dated September 3, 2013.

2. Attached hereto please find Exhibit B, the Press Release for the Non-Prosecution Agreement Defendant Northern Adult Daily Health Care Center and the New York Attorney General's Medicaid Fraud Control Unit, dated August 12, 2014.
3. Attached hereto please find Exhibit C, the Non-Prosecution Agreement between Defendant Northern Adult Daily Health Care Center and the New York Attorney General's Medicaid Fraud Control Unit, dated June 26, 2014.
4. Attached hereto please find Exhibit D, Relators' Amended Complaint, dated June 25, 2015.

Dated: New York, New York
July 27, 2015

By:

/s/Robert W. Sadowski
Robert W. Sadowski